

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

G.T.,

Plaintiff,

v.

LIBERTY MUTUAL FIRE
INSURANCE COMPANY, et al.,

Defendants.

CASE NO. 4:25-CV-00128-HEA

**CONSENT MOTION FOR EXTENSION OF TIME TO RESPOND TO LIBERTY
MUTUAL'S MOTION TO BIFURCATE**

COMES NOW Plaintiff, by and through counsel, and for her consent motion for extension of time to respond to Liberty Mutual's Motion to Bifurcate (Doc. 43) states as follows:

1. On March 13, 2025, Liberty Mutual filed a Motion to Bifurcate and Stay Discovery and Trial as to Counts II-V (Doc. 43).
2. Plaintiff's Counsel leaves tomorrow for a family vacation and will not be back in the office until March 24, 2025.
3. Plaintiff's Counsel respectfully requests a 21-day extension of the deadline in which to file a response to the Motion to Bifurcate (Doc. 43), which would set the deadline as April 17, 2025
4. Plaintiff's Counsel has conferred with Defendants regarding this request and Defendants have graciously consented to the extension.
5. The request is not made for purposes of unnecessarily delaying this matter, but instead to give Plaintiff's Counsel the ability to review the Motion in full once back from vacation and to confer with Plaintiff regarding her position on the Motion.

6. This request is timely made pursuant to Local Rule 4.01(B).

Wherefore, Plaintiff respectfully requests this Court grant the above-requested extension in which to file a response to Liberty Mutual's Motion to Bifurcate (Doc. 43) and for any further relief this Court deems just and proper.

Respectfully submitted,

O'BRIEN LAW FIRM, P.C.

/s/ Grant C. Boyd

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